

North West Sustainable Drainage System (SuDS) Pro-forma

Frequently Asked Questions – April 2020

Q. What is the SuDS pro-forma?

- A. It is a form for applicants and/or their consultants to complete and submit along with their planning application for major development.

The purpose of the pro-forma is to increase consistency and to ensure key minimum information about sustainable drainage proposals is included in the initial major planning application. This reduces the need to request additional information throughout the assessment process.

It will also help more sustainable drainage systems to meet design specification necessary, should the developer wish to offer the site for adoption to United Utilities.

The pro-forma *does not* replace the requirement for a site-specific flood risk assessment or for a sustainable drainage strategy.

This minimum information – set out in the pro-forma – is needed for flood risk management authorities, particularly the Lead Local Flood Authority and United Utilities, to provide an informed substantive response about sustainable drainage proposals to the Local Planning Authority.

Q. Why do we need a SuDS pro-forma when we already have a checklist for SuDS?

- A. A checklist states the information to be submitted for sustainable drainage proposals. The pro-forma builds on this by specifying how this must be evidenced and asks the applicant to be accountable for confirming this has been met.

Where the pro-forma becomes a planning validation requirement, it also means this information must be submitted before the application can be processed. The pro-forma can also provide a tool to support planners and flood risk managers in liaising with consultees for a qualitative check on the information submitted.

As the pro-forma has been developed by representatives from all flood risk management authorities, it is fit-for-purpose tool for use by the Lead Local Flood Authority and United Utilities as those who comment on sustainable drainage proposals and surface water flood risk. This will support planners and flood risk managers in their approach to assessing sustainable drainage proposals by ensuring that the approach is consistent and that we can share and learn from best practice.

Q. My Local authority already requires a site-specific flood risk assessment and a sustainable drainage strategy for major applications. Why do I need a pro-forma for SuDS as well?

- A. The pro-forma has been designed to clarify and confirm that the minimum information for sustainable drainage proposals is submitted with the initial planning application.

The submission of a site-specific flood risk assessment and/or sustainable drainage strategy does not mean that this minimum information is contained within. The quality of the content of these documents can vary widely and the pro-forma will ensure a consistent minimum of information is submitted.

Q. Who will complete the pro-forma and when?

- A. Where implemented by Local Planning Authorities, the pro-forma will be completed by the applicant/consultant and submitted as part of their planning application for major development.

The pro-forma will be submitted with your major planning application, including for Outline, Full, Hybrid and Reserved Matters applications. It can also be used at pre-application stage.

Q. Has the pro-forma been trialled anywhere?

- A. Yes. Sefton Council and Knowsley Council have implemented an earlier version of the pro-forma.

33 London Authorities and Birmingham City Council have also successfully implemented a SuDS pro-forma. A pro-forma approach to SuDS is increasingly regarded as best practice.

A copy of the Sefton SuDS Pro-forma, which was used as a baseline for this document, was shared at United Utilities Developer Engagement Day in October 2019. Feedback received on the day was positive with an overwhelming majority supporting greater clarity on minimum information requirements and a more consistent approach to sustainable drainage proposals through the planning process.

Q. Who are the North West Regional Flood and Coastal Committee?

- A. The North West Regional Flood and Coastal Committee (RFCC) is one of 12 RFCCs in England. RFCCs were established under the Flood and Water Management Act 2010. They bring together, with an independent Chair, the principle authorities responsible for managing flood and coastal erosion risk (Environment Agency, Lead Local Flood Authorities (County and Unitary Councils) and Water and Sewerage Companies) in their region, along with independent members who provide specialist skills or expertise.

RFCCs play an important role in deciding local priorities, guiding flood and coastal risk management activities, approving programmes of work, and raising Local Levy to provide a local source of funding.

Q. Who has been involved in the development of the pro-forma and guidance?

- A. Representatives from flood risk management authorities and local planning authorities across the North West, including from:
- Environment Agency
 - United Utilities
 - Cumbria – Cumbria County Council
 - Lancashire – Lancashire County Council, Fylde Council, Lancaster City Council
 - Greater Manchester – Rochdale Council, Wigan Council
 - Merseyside – Sefton Council, Wirral Council
 - Cheshire – Warrington Council

Q. How will the pro-forma be used and shared between the Local Planning Authority, and the flood risk management authorities (Lead Local Flood Authority, United Utilities, Highway Authority and the Environment Agency)?

- A. Once implemented, the pro-forma will be owned and maintained by the Local Planning Authority, in conjunction with the Lead Local Flood Authority, who may liaise with other flood risk management authorities as required.

The North West Regional Flood and Coastal Committee will be the custodian of the 'master' pro-forma and will bring partners together at appropriate times to consider the need for any review. This will ensure the pro-forma and guidance take account of learning and experience from its implementation, and to ensure changes in national approaches are incorporated. All feedback is valuable and welcome. Please send any feedback to NW-RFCC@environment-agency.gov.uk.

Q. How does the pro-forma benefit the Local Planning Authority, and the Lead Local Flood Authority, in determining major planning applications?

- A. The pro-forma ensures minimum information about sustainable drainage proposals is included in major planning applications.

This will ensure flood risk management authorities have enough information with the initial planning application to provide the Local Planning Authority with an informed substantive response. This reduces the need to request additional information throughout the assessment process, thereby reducing delays in determining sustainable drainage proposals.

The pro-forma also provides clarity on minimum information requirements and support a more consistent approach to sustainable drainage proposals across the North West.

The pro-forma can also be used at pre-application enquires by making prospective applicants aware of minimum information requirements for sustainable drainage systems up-front and what evidence is needed to demonstrate this.

Q. How does the pro-forma benefit the developer?

- A. The pro-forma provides clarity on minimum information and evidence requirements for sustainable drainage proposals, supporting developers in appointing an appropriately qualified consultant.

It will support a more consistent approach to sustainable drainage proposals across the North West, meaning a template brief for a consultant can be produced, saving time.

By being clear about the minimum information required to appropriately advise on sustainable drainage proposals (by Lead Local Flood Authorities *and* United Utilities), this should help reduce delays caused when additional information has to be requested, and allow the Local Planning Authority to determine the planning application based on complete advice.

When procuring work for site investigation/ ground investigation, the pro-forma will allow a developer to check that the minimum information to support the sustainable drainage design is included within

the work order. For example, when completing boreholes to inform the foundation design, infiltration testing can be undertaken.

It may therefore be particularly helpful to smaller developers who may appoint one consultancy for all aspects of design.

Q. What benefits is the pro-forma intended to achieve?

- A. Better, clearer, more comprehensive information submitted for sustainable drainage proposals, greater clarity for developers on requirements, and it will help more sustainable drainage systems to meet the design specification necessary for adoption of sustainable drainage systems by United Utilities, in accordance with the sewerage sector's Design and Construction Guidance.

Q. How will the pro-forma be implemented across the North West?

- A. It is recommended the pro-forma is implemented through the Planning Validation Checklist for major development. This will ensure the pro-forma is submitted for all major planning applications along with the planning application.

Q. Can LPAs implement an amended version of the pro-forma?

- A. The pro-forma is designed to be a consistent standard product. If individual Local Planning Authorities need to include local variations, based on the needs of the Local Authority (e.g. Local Plan requirements), this is OK providing these are clearly identified within each section.

Q. Do Local Planning Authorities in the North West have to implement the pro-forma?

- A. The North West Regional Flood and Coastal Committee (RFCC), who oversee the management of flood risk across the North West, have endorsed the pro-forma as best practice and are encouraging all local planning authorities across the North West to implement it. The RFCC would like to see consistency in the approach applied to SuDS requirements across the North West including adherence to the hierarchy for sustainable drainage set out in national planning policy. The aim is to promote quality blue-green infrastructure and to better manage surface water flood risk within the planning system.

Whether or not the pro-forma is implemented, and the timing of implementation, is a matter for each Local Planning Authority.

The pro-forma has been designed by multiple partners across the North West to improve the process and to support voluntary adoption of sustainable drainage systems by United Utilities, making it more consistent across the region.

Q. What guidance and training can be provided to Local Planning Authorities to support the implementation of the pro-forma?

- A. Your Lead Local Flood Authority and Flood Risk Coordinator can provide support in implementing the pro-forma. Details of Flood Risk Coordinators are available by contacting NW-RFCC@environment-agency.gov.uk.

Q. How can the Local Planning Authority ensure that developers complete the pro-forma?

- A. The aim is for the pro-forma to be part of the planning validation checklist so the planning application will not be considered complete until a completed pro-forma has been provided.

The Local Planning Authority are expected to check the form is complete, however they are not expected to complete a qualitative check. The minimum information would be checked by the consultees.

Q. Why should developers use/complete the pro-forma?

- A. The aim is for the pro-forma to be part of the planning validation checklist so the planning application will not be considered complete unless a completed pro-forma has been provided.

Q. Who has been consulted on the pro-forma?

- A. All local planning authorities and flood risk management authorities were directly invited to respond to the consultation on the draft pro-forma. A cross section of developers and consultants were also invited to comment.

A total of 48 responses were received. Most responses came from flood risk officers or engineers but there was also a good spread across highways officers, planning officers, developers, consultants and others.